



an agency of the
Department of Arts and Culture

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Enquiries: Natasha Higgitt

Date: Friday April 22, 2016

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Email: nhiggitt@sahra.org.za

CaseID: 9318

Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Mulilo Renewable Project Developments (Pty) Ltd

Mulilo Renewable Project Developments (Pty) Ltd proposes a 75 MW solar energy facility on Portion 3 of Gemsbok Bult 120, about 28 km northeast of Kenhardt, Northern Cape

Mulilo Renewable Project Developments (Pty) Ltd appointed CSIR to undertake an Environmental Impact Assessment (EIA) process for the proposed development of a 75MW Solar Photovoltaic Facility (Gemsbok Solar PV4) on Portion 3 of Gemsbok Bult Farm 120, north-east of Kenhardt, Northern Cape Province. An Environmental Impact Assessment (EIA) Report was completed in terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and the EIA Regulations 2014. The proposed project will consist of Solar PV panel array covering 220 ha and associated infrastructure i.e. laydown yards, workshop area and offices, Inverter Stations, on-site substation, 10 km 22/33KV internal transmission lines, 10 km internal access roads, stormwater channels, and a 4 km high voltage overhead transmission lines. The Gemsbok Solar PV4 project will connect to the Eskom Nieuwehoop Substation via the proposed Gemsbok Solar PV1 Substation via a 132kV overhead transmission line.

Jayson Orton and John Almond were appointed to conduct the Heritage Impact Assessment and the Palaeontological Impact Assessment for the project respectively.

Orton, 2016. Heritage Impact Assessment: Environmental Impact Assessment for the Proposed Development of a 75 MW Solar Photovoltaic Facility (Gemsbok Solar PV4) on Gemsbok Bult 120/3, northeast of Kenhardt, Northern Cape Province

A total of 3 heritage resources were identified within the proposed impact footprint for the PV array, alternative and transmission lines. These include Stone Age artefact scatters and quartz outcrops with associated flaked lithics. None of the identified heritage resources were considered to be of medium or high significance. No impacts to significant heritage resources are expected.

Recommendations provided in the report include the following:

- The Environmental Control Officer (ECO) must meet with workers on site at the start of the



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construction phase to explain the possibility that previously unidentified graves might be present and explain the procedure that must be followed to report the find;

- All construction and operation activities must take place within the authorised footprint to minimize damage to heritage resources that have not been mitigated;
- Where technically feasible, earthy-coloured paint should be used on the built elements of the project to reduce the visual contrast in the landscape;
- If any archaeological material or human remains are uncovered during the course of the construction then work in the immediate area should be halted. The find would need to be reported to SAHRA and may require inspection by an archaeologist. Such a heritage resource is the property of the state and may require excavation and curation in an approved institution.

Almond, 2016. Palaeontological Impact Assessment: Environmental Impact Assessment for the Proposed Development of a 75 MW Solar Photovoltaic Facility (GEMSBOK SOLAR PV4) on portion 3 of Gemsbok Bult Farm 120, north-east of Kenhardt, Northern Cape Province

The proposed project area is underlain by Precambrian basement rocks, which are igneous and metamorphic and are entirely unfossiliferous. Small patches of calcrete, gravelly to sandy river alluvium, pan sediments, surface gravels as well as Pleistocene to Recent windblown sands of Gordonia Formation may contain fossil remains. No previously recorded areas or sites of exceptional fossil heritage or significance have been identified within the project area. The impact on fossil heritage is rated as very low.

Recommendations provided in the report include the following:

- Substantial bedrock excavations should be monitored by the responsible ECO;
- If any fossil material is identified during construction, the responsible ECO should safeguard these preferable in-situ and report the find to SAHRA so that the appropriate actions can be taken by a professional palaeontologist at the developers expense; and
- The above recommendations should be included in the EMP for the project.

According to the vegetation study conducted for the project, a total of 70% of the proposed site falls within areas of high sensitivity. It is noted that the Environmental Assessment Practitioner (EAP) recommended that the Gemsbok Solar PV4 Project should be refused due to results of the vegetation specialists.

Final Comment

Regarding archaeological and palaeontological heritage resources, the SAHRA Archaeology, Palaeontology

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and Meteorites Unit accepts the submitted HIA and PIA, and promotes the recommendations contained within the reports. If, for any reason, Environmental Authorisation is granted for the project, the recommendations provided in the reports and the following additional conditions must be adhered to and must form part of the final Environmental Management Programme (EMPr):

- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/Phillip Hine 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Natasha Higgitt
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
SAHRA Head Archaeologist (Acting)
South African Heritage Resources Agency

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ADMIN:

Direct URL to case: <http://www.sahra.org.za/node/360912>
(DEA, Ref: 14/12/16/3/3/2/842)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.